

Before the

Federal Communications Commission
Washington, D.C. 20554

In the matter of:

Replacement of Part 90 by Part 88 to
Revise the Private Land Mobile Radio
Services and Modify the Policies
Governing Them

PR Docket No. 92-235

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Reply Comments of
The County of Orange, California

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The County of Orange, California (County), respectfully submits the following reply comments in response to the Commission's Notice of Proposed Rule Making (NPRM) to revise and modify its Rules and Regulations affecting the Private Land Mobile Radio Services.

The County agrees that, while attention must be devoted to solving the current frequency congestion problems (especially in Southern California), the proposed changes are much too ambitious given the current economic climate, the threat of layoffs, and the general lack of funds sufficient to accommodate such changes. Even if there were budgets for changes, the "improvements" to communications are questionable. The County may be willing to make certain changes in the spirit of providing improved radio communications to public safety and non-public safety users alike, but such changes must be brought about by a reasonable and highly efficient expenditure of funds, and in a manner that will minimize the disruption of service.

Further, the County restates its belief that the proposed Docket strives to legislate technology, as opposed to regulate technology. This approach, in the opinion of the County, is incorrect and impractical.

IMPLEMENTATION SCHEDULE/MIGRATION PATH

The County is in general agreement with the LMCC (option A) migration plan, with the exception of the specific dates listed. It is too early to implement 5 kHz or 6.25 kHz channelization, especially in one step. The County believes the 15 kHz/7.5 kHz split concept for the 150 MHz band presented by AAR has merit and is worth further consideration, but also sees logic in the 12.5 kHz/6.25 kHz approach for compatibility with Federal government agencies as well as to minimize interference with Canada and Mexico.

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SPECTRUM EFFICIENCY

It is this arena where it is especially difficult to predict where technology will lead. While there is a digital standard under development, forged by APCO Project 25, a more spectrally-efficient mode of communications may yet be developed. It is critically important that any legislation instituted neither mandate any specific manufacturer's method nor limit the forms

communications community. This single frequency coordinator should be representative of all of the public safety services. The County believes that APCO is the only representative organization, and fully supports the Commission designating APCO as the single public safety frequency coordinator.

TERMINATION OF UHF TV/LAND MOBILE SHARING DOCKET

The County is entirely OPPOSED to the termination of the UHF TV/Land Mobile Sharing Docket. This action would exacerbate the frequency shortage problem. It was never the understanding or intent of the Commission to have the land mobile community to return this spectrum, as evidenced by the large number of systems established, especially in the Southern California area. For example, several city systems exist in the 506 MHz range, and Los Angeles Sheriff Office has an extensive system in the 482 MHz band.

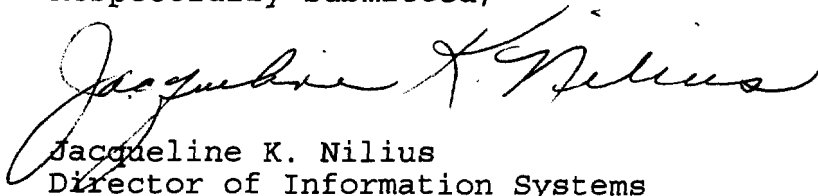
USER/INDUSTRY/GOVERNMENT CONSENSUS

The County supports the establishment of a committee as a forum to discuss technical parameters and other aspects of spectrum refarming, narrow band modulation methods, etc. The committee should consist of government agencies, manufacturers, research facilities, and user agencies to assure all interests are represented.

SUMMARY

The County agrees that action must be taken to alleviate the current spectrum congestion problems, especially in regions of the country such as the Los Angeles area. It is believed that the best approach may be separate Commission Rules and Regulations for public safety.

Respectfully submitted,



Jacqueline K. Nilius
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28 July 1993